UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

IN RE

CHAPTER 13

MICHAEL EARNEST GRAHAM

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Debtor(s) : No. 18-18113 elf

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Michael Earnest Graham, the above-captioned Debtor, has filed a Motion to Sell Property Free and Clear of Liens.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion then on or before **May 24, 2019**, you or your attorney must do <u>all</u> of the following:
 - (a) file an objection explaining your position at:

Clerk's Office United States Bankruptcy Court Robert N.C. Nix Building, 4th Floor 900 Market Street Philadelphia, PA 19107

If you mail your objection to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Michele Perez Capilato, Esquire Law Offices of Michele Perez Capilato 500 Office Center Drive, Suite 400 Fort Washington, PA 19034 phone: (267) 513-1777

fax: 1(866) 535-8160

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on **November 28, 2019, at 1:00 p.m. in Courtroom #1**, United States

Bankruptcy Court, Robert N.C. Nix Building, 2nd Floor, 900 Market Street, Philadelphia, PA 19107.

- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an objection.

Dated: May 10, 2019 /s/ Michele Perez Capilato
Michele Perez Capilato, Esquire